

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

<b>GREGORY STILLMAN,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>Case No.: 4:19-cv-00222</b>
<b>v.</b>	)	
	)	
<b>WAL MART STORES EAST I, LP,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE OF  
DEFENDANT WAL-MART STORES EAST I, LP**

Please take notice that pursuant to Federal Rule of Civil Procedure 30(b)(6), the deposition of a of Defendant Wal-Mart Stores East I, LP will be taken by oral examination regarding all information known or reasonably available to Defendant with respect to the subjects identified in Exhibit A. The deposition will take place at the office of Halbrook Wood, PC, 3500 West 75th Street, Suite 300. Prairie Village, Kansas 66208, at 10:00 a.m. on Friday, December 20, 2019.

Respectfully submitted,

MONTEE LAW FIRM, P.C.

/s/ James Montee  
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ATTORNEY FOR PLAINTIFFS

## **EXHIBIT A**

In accordance with Federal Rule of Civil Procedure 30(b)(6), Plaintiff Gregory Stillman designates the following topics for examination. In construing the topics, the following definitions shall apply.

1. “Raytown Supercenter” means the store (number 1094) operated by Defendant Walmart at 10300 E. Highway 350, Raytown, Missouri, 64138.

2. “Overhead Door” refers to the overhead door at the entrance of the Garden Center at the Raytown Supercenter, which is described and referenced in Plaintiff’s Complaint.

### **TOPICS**

1. Policies and procedures in effect at Raytown Supercenter on March 9, 2018 regarding customer injuries or accidents on the premises of the Raytown Supercenter.

2. Internal reports and summaries concerning the incident which is the subject of the Complaint.

3. All policies, procedures, and practices in effect on March 8, 2018 regarding the operation and safety of entrances at the Raytown Supercenter, including the Overhead Door.

4. Maintenance, servicing, repairs, or replacements to the Overhead Door from March 8, 2017 through May 8, 2018.

5. All incidents involving the Overhead Door which caused an injury to any person from March 8, 2017 through March 8, 2018.

6. The mechanisms and manner in which the Overhead Door is raised and lowered, including any safety devices or practices.

7. All incidents in which the Overhead Door malfunctioned or lowered unexpectedly from March 8, 2017 through March 8, 2018.

8. The extent and circumstances under which Defendant Walmart offered medical treatment or care to Plaintiff Stillman on March 8, 2018, or thereafter.

9. Facts or documents which you contend support your affirmative defense that the negligence, fault, or carelessness of Plaintiff was the sole, intervening, or superseding cause of Plaintiff’s alleged injuries and damages.

10. Facts or documents which you contend support your affirmative defense that the negligence, fault, or carelessness of Plaintiff caused or contributed to Plaintiff’s alleged injuries and damages.

11. Facts or documents which you contend support your affirmative defense that the negligence, fault, or carelessness of other persons or entities over which Defendant had no control caused or contributed to Plaintiff's alleged injuries.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies a true and exact copy of the above and foregoing *Notice of Deposition* was served via ECF, this 5<sup>th</sup> day of December 2019 to:

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Jared Marsh, MO #51817  
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ATTORNEYS FOR DEFENDANT

/s/ James A. Montee  
Attorney